

1 Emily L. Robinson Esq.
2 Law Office of Emily L. Robinson
3 5012 Eagle Rock Blvd.
4 Los Angeles, CA 90041
5 emily@lawofficeemilyrobinson.com
6 (323) 524-7611
7 (323) 524-4001

8 Counsel for Petitioner

9 UNITED STATES DISTRICT COURT FOR THE
10 EASTERN DISTRICT OF CALIFORNIA

11 JOSE PEDRO ORTEGA

12 Petitioner,
13 vs.

Case No.

14 Kristi NOEM, Secretary, U.S. Department of Homeland
15 Security; Pamela BONDI, U.S. Attorney General; Todd
16 LYONS, Acting Director, Immigration and Customs
17 Enforcement; Sergio ALBARRAN, Acting Director, San
18 Francisco Field Office, Immigration and Customs
19 Enforcement, Enforcement and Removal Operations;
20 Minga WOFFORD, Warden, Mesa Verde ICE Processing
21 Center; EXECUTIVE OFFICE FOR IMMIGRATION
22 REVIEW; IMMIGRATION AND CUSTOMS
23 ENFORCEMENT; and U.S. DEPARTMENT OF
24 HOMELAND SECURITY,

25 Respondents

**VERIFIED PETITION FOR
HABEAS CORPUS AND
COMPLAINT FOR INJUNCTIVE
AND DECLARATORY RELIEF**

IMMIGRATION HABEAS CASE

**ORAL ARGUMENT
REQUESTED**

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FACTUAL BACKGROUND

PETITIONER'S IMMIGRATION HISTORY

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1. JOSE PEDRO ORTEGA, by and through his undersigned counsel, hereby files this petition for a writ of habeas corpus challenging the unlawful revocation of his release from Department of Homeland Security (DHS) custody.

2. When a non-citizen presents themselves at a port of entry, Customs and Border Patrol (CBP) has the authority to parole him or her into the United States. *See* 8 U.S.C. § 1182(d)(5). Such parole is authorized on “a case-by-case basis for urgent humanitarian reasons or significant public benefit.” *Id.* at § 1182(d)(5)(A). “[W]hen the purposes of such parole shall . . . have been served,” the non-citizen shall “be returned to the custody from which [s]he was paroled.” *Id.*

3. Petitioner was paroled into the United States on approximately November 10, 2018, 2018 with his family unit which includes his wife Sandra Garcia Carranza, (██████████); and three minor children J██████████ (██████████, age 15); D██████████ (██████████, age 12); and P██████████ (██████████, age 10). They were released from CBP custody as a family unit on an Order of Release on Recognizance (ORR). They have proceeded with all of their immigration matters as a family unit and never missed appointments or failed to avail themselves to our immigration system.

4. Before paroling the family, CBP determined that they were not a flight risk or danger to the community. On information and belief, Petitioner was granted parole for the purpose of applying for asylum in the United States. He was released with his family for whom he is primary financial provider.

5. The DHS subsequently filed a Notice to Appear, commencing removal proceedings against Petitioner and his family. He is lead Respondent in the case as a family unit.

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6. Petitioner at all times complied with the terms of his OREC and he has no criminal record anywhere in the world.
7. While out of ICE custody, Petitioner filed for asylum with his family. They paid the required annual asylum fee before the injunction, attended biometrics, obtained other background checks for the Court and submitted a robust asylum filing. He is also primary financial support for his wife and three minor children.
8. Since 2018 when Petitioner entered and his compliance with the terms of release were more and more secure, he had his ankle monitor removed (approximately 5 years ago), and graduated to rare in person check-ins and use of the digital phone application.
9. On September 30, 2025, Petitioner was at work when he was called in to meet with ICE due to “changes in the application.” He had no reason to think he would be detained.
10. On information and belief, prior to his detention, Petitioner was given no notice of ICE’s intention to re-detain him, and he was not provided with any information about why his OREC was revoked. This behavior is part of a pattern and practice emerging by ERO wherein they detain compliant individuals without notice at check-ins and separate them from their families.
11. On information and belief, ICE has no particularized evidence that Petitioner is a danger to the community or a flight risk.
12. On information and belief, Petitioner has not received an individualized hearing before a neutral decisionmaker to assess whether his recent re-detention is warranted due to danger or flight risk.

PARTIES

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2 13. Petitioner is a citizen of Mexico, who is currently in the custody of the DHS at the Mesa
3 Verde Detention Facility.

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5 14. Respondent Kristi Noem, the Secretary of the DHS, is the highest-ranking official within
6 the DHS. Respondent Noem, by and through her agency for the DHS, is responsible for
7 the implementation of the INA, and for ensuring compliance with applicable federal law.
8 She is also responsible for the detention of non-citizens by DHS. Respondent Noem is
9 sued in her official capacity as an agent of the government of the United States.

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11 15. Respondent Pamela Bondi, the Attorney General, is the highest-ranking official within
12 the Department of Justice (DOJ). Respondent Bondi has responsibility for the
13 administration and enforcement of the immigration laws pursuant to 8 U.S.C. § 1103.
14 As the Immigration and Nationality Act (INA) has not been amended to reflect the
15 designation of the Secretary of the DHS as the administrator and enforcer of immigration
16 laws, Respondent Bondi is sued in her official capacity to the extent that 8 U.S.C. § 1102
17 gives her authority over immigration law.
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19 16. Todd Lyons is the Acting Director of Immigration and Customs Enforcement, a federal
20 law enforcement agency within the Department of Homeland Security. ICE's
21 responsibilities include operating the immigration detention system. In his capacity as
22 ICE Acting Director, Respondent Lyons exercises control over and is a custodian of
23 persons held at ICE facilities nationally. He is Petitioners' immediate custodian and is
24 responsible for Petitioners' detention. He is sued in his official capacity.
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26 17. Respondent Sergio Albarran is the Acting Director of the San Francisco Field Office of
27 ICE's Enforcement and Removal Operations division. As such, he is the custodian of all
28 persons held at the ICE facilities within the San Francisco Field Office Area of

1 Responsibility. He is Petitioners' immediate custodian and is responsible for Petitioners'
2 detention. He is sued in his official capacity.

3 18. Respondent Minga Wofford is the Facility Administrator of Mesa Verde ICE Processing
4 Center, a private for-profit detention facility owned and operated by the GEO Group,
5 Inc., that contracts with ICE to detain individuals suspected of civil immigration
6 violations. Respondent Wofford is Petitioner Esvin Perez Guinea's immediate physical
7 custodian. Respondent Wofford is sued in her official capacity.

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9 19. Respondent Executive Office for Immigration Review (EOIR) is the federal agency
10 within the Department of Justice responsible for implementing the INA in removal
11 proceedings, including for custody redeterminations or bond hearings.

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13 20. Respondent Department of Homeland Security (DHS) is the federal agency responsible
14 for implementing and enforcing the INA, including the detention and removal of
15 noncitizens.

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17 21. Respondent Immigration and Customs Enforcement (ICE) is the agency within DHS
18 responsible for implementing and enforcing the INA, including the detention and
19 removal of noncitizens.

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21 **JURISDICTION AND VENUE**

22 22. This Court has jurisdiction over the present action pursuant to 28 U.S.C. § 1331, general
23 federal question jurisdiction; habeas jurisdiction pursuant to 28 U.S.C. § 2241 et seq.;
24 Art I, § 9, Cl. 2 of the United States Constitution (the Suspension Clause); 28 U.S.C.
25 § 1651 (All Writs Act), 28 U.S.C. §§ 2201-02 (Declaratory Judgment Act); the Fourth
26 and Fifth Amendments to the U.S. Constitution; and the common law. This action arises
27 under the Due Process Clause of the Fifth Amendment of the U.S. Constitution and the
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1 INA. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et.
2 seq., the Declaratory Judgment Act, 28 U.S.C. § 2001 et seq., and the All-Writs Act, 28
3 U.S.C. § 1651.

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5 23. Federal district courts have jurisdiction to hear habeas claims by noncitizens challenging
6 the lawfulness or constitutionality of DHS conduct. Federal courts are not stripped of
7 jurisdiction under 8 U.S.C. § 1252. *See e.g., Zadvydas v. Davis*, 533 U.S. 678, 687
8 (2001).

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10 24. Venue is proper pursuant to 28 U.S.C. § 1391(e) because Respondents are agencies of
11 the United States or officers or employees thereof acting in their official capacity or
12 under color of legal authority; Petitioner is in the custody of the Los Angeles Field
13 Office of Immigration and Customs Enforcement and the warden of the Adelanto
14 Detention Center, both of which are in the jurisdiction of the Central District of
15 California; and there is no real property involved in this action.

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17 **LEGAL BACKGROUND**

18 25. The Constitution establishes due process rights for “all ‘persons’ within the United States,
19 including [noncitizens], whether their presence here is lawful, unlawful, temporary, or
20 permanent.” *Hernandez v. Sessions*, 872 F.3d 976, 990 (9th Cir. 2017) (quoting
21 *Zadvydas*, 533 U.S. at 693). These due process rights are both substantive and procedural.

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23 26. *First*, “[t]he touchstone of due process is protection of the individual against arbitrary
24 action of government,” *Wolff v. McDonnell*, 418 U.S. 539, 558 (1974), including “the
25 exercise of power without any reasonable justification in the service of a legitimate
26 government objective.” *Cnty. of Sacramento v. Lewis*, 523 U.S. 833, 846 (1998).

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28 27. These protections extend to noncitizens facing detention, as “[i]n our society liberty is

1 the norm, and detention prior to trial or without trial is the carefully limited exception.”
2 *United States v. Salerno*, 481 U.S. 739, 755 (1987). Accordingly, “[f]reedom
3 from imprisonment—from government custody, detention, or other forms of physical
4 restraint—lies at the heart of the liberty that [the Due Process] Clause protects.”
5 *Zadvydas*, 533 U.S. at 690.
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7 28. Substantive due process thus requires that all forms of civil detention—including
8 immigration detention—bear a “reasonable relation” to a non-punitive purpose. *See*
9 *Jackson v. Indiana*, 406 U.S. 715, 738 (1972). The Supreme Court has recognized
10 only two permissible non-punitive purposes for immigration detention: ensuring a
11 noncitizen’s appearance at immigration proceedings and preventing danger to the
12 community. *Zadvydas*, 533 U.S. at 690–92; *see also Demore v. Kim*, 538 U.S. 510 at 519–
13 20, 527–28, 31 (2003).
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15 29. *Second*, the procedural component of the Due Process Clause prohibits the
16 government from imposing even permissible physical restraints without adequate
17 procedural safeguards.
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19 30. Generally, “the Constitution requires some kind of a hearing *before* the State
20 deprives a person of liberty or property.” *Zinerman v. Burch*, 494 U.S. 113, 127 (1990).
21 This is so even in cases where that freedom is lawfully revocable. *See Hurd v. D.C.,*
22 *Gov’t*, 864 F.3d at 683 (citing *Young v. Harper*, 520 U.S. 143, 152 (1997) (re-
23 detention after pre-parole conditional supervision requires pre-deprivation hearing));
24 *Gagnon v. Scarpelli*, 411 U.S. 778, 782 (1973) (same, in probation context); *Morrissey*
25 *v. Brewer*, 408 U.S. 471 (1972) (same, in parole context).
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27 31. After an initial release from custody on conditions, even a person paroled following a
28 conviction for a criminal offense for which they may lawfully have remained incarcerated

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has a protected liberty interest in that conditional release. *Morrissey* at 408 U.S. at 482. As the Supreme Court recognized, “[t]he parolee has relied on at least an implicit promise that parole will be revoked only if he fails to live up to the parole conditions.” *Id.* “By whatever name, the liberty is valuable and must be seen within the protection of the [Constitution].” *Id.*

32. This reasoning applies with equal if not greater force to people paroled from civil immigration detention at the border, like Petitioner. After all, noncitizens living in the United States like Petitioner have a protected liberty interest in their ongoing freedom from confinement. See *Zadvydas*, 533 U.S. at 690. “Given the civil context [of immigration detention], [the] liberty interest [of noncitizens released from custody] is arguably greater than the interest of parolees in *Morrissey*.” *Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970 (N.D. Cal. 2019) (citing *Morrissey*, 408 U.S. at 487).

FIRST CAUSE OF ACTION

**VIOLATION OF THE FIFTH AMENDMENT TO THE UNITED STATES
CONSTITUTION (SUBSTANTIVE DUE PROCESS – DETENTION)**

33. Petitioner re-alleges and incorporates each allegation contained in paragraphs 1-32.

34. The Due Process Clause of the Fifth Amendment protects all “person[s]” from deprivation of liberty “without due process of law.” U.S. Const. amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690.

- 1 35. Immigration detention is constitutionally permissible only when it furthers the
2 government's legitimate goals of ensuring the noncitizen's appearance during removal
3 proceedings and preventing danger to the community. *See id.*
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- 5 36. Petitioner is not a flight risk or danger to the community. Respondents' detention of
6 Petitioner is therefore unjustified and unlawful. Accordingly, Petitioner is being
7 detained in violation of the Due Process Clause of the Fifth Amendment.
- 8 37. Moreover, Petitioner's detention is punitive as it bears no "reasonable relation" to any
9 legitimate government purpose. *Id.* (finding immigration detention is civil and thus
10 ostensibly "nonpunitive in purpose and effect"). Here, the purpose of Petitioner's detention
11 is not to protect against risk of flight or dangerousness.
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13 **SECOND CAUSE OF ACTION**

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15 **VIOLATION OF THE FIFTH AMENDMENT TO THE UNITED STATES**

16 **CONSTITUTION (PROCEDURAL DUE PROCESS – DETENTION)**

- 17 38. Petitioner re-alleges and incorporates each allegation contained in paragraphs 1-32.
- 18 39. As part of the liberty protected by the Due Process Clause, Petitioner has a weighty liberty
19 interest in avoiding re-incarceration after his release. *See Young v. Harper*, 520 U.S. 143,
20 146–47 (1997); *Gagnon v. Scarpelli*, 411 U.S. 778, 781–82 (1973); *Morrissey*, 408 U.S. at
21 482–83; *see also Ortega*, 415 F. Supp. 3d at 969–70 (holding that a noncitizen has a
22 protected liberty interest in remaining out of custody following an IJ's bond
23 determination).
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- 25 40. Accordingly, "[i]n the context of immigration detention, it is well-settled that due process
26 requires adequate procedural protections to ensure that the government's asserted
27 justification for physical confinement outweighs the individual's constitutionally
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1 protected interest in avoiding physical restraint.” *Hernandez*, 872 F.3d at 990 (cleaned
2 up); *Zinermon*, 494 U.S. at 127 (Generally, “the Constitution requires some kind of a
3 hearing *before* the State deprives a person of liberty or property.”). In the
4 immigration context, for such hearings to comply with due process, the government
5 must bear the burden to demonstrate, by clear and convincing evidence, that the
6 noncitizen poses a flight risk or danger to the community. *See Singh v. Holder*, 638 F.3d
7 1196, 1203 (9th Cir. 2011); *see also Martinez v. Clark*, 124 F.4th 775, 785, 786 (9th Cir.
8 2024).

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10 41. Petitioner’s re-detention without a pre-deprivation hearing violated due process. More
11 than **seven years** after deciding to release Petitioner and his family from custody on
12 their own recognizance, Respondents re-detained Petitioner with no notice, no
13 explanation of the justification for his re-detention, and no opportunity to contest her re-
14 detention before a neutral adjudicator before being taken into custody. The regulations strip
15 an IJ of any authority to release him on bond, eliminating the only possibility of review of
16 her detention status within the immigration court system. *See* 8 C.F.R.
17 § 1003.19(h)(2)(i)(B).
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20 42. Petitioner has a profound personal interest in his liberty. *See Fernandez Lopez v.*
21 *Wofford*, 2025 WL 2959319, *4 (E.D. Ca. Oct. 17, 2025) (unpub) (finding a non-citizen
22 granted parole at the border has a liberty interest in his conditional release and that such a
23 parolee has a implicit right entitlement to remain at liberty if he complies with the
24 conditions of his parole); *Abduraimov v. Andrews*, 2025 WL 2912307, *6 (E.D. Ca. Oct.
25 14, 2025) (unpub) (finding that immigration parole has a “legitimate and reasonably
26 strong private liberty interest”); *Noori v. Larose*, 2025 WL 2800149, *10 (S.D. Ca. Oct. 1,
27 2025) (unpub) (parolee developed a private interest in remaining free in the one year he
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1 has resided in the United States since entry); *Munoz Materano v. Arteta*, 2025 WL
2 2630826, *13 (S.D.N.Y. Sept. 12, 2025) (unpub); *Ramirez Tesara v. Wamsley*, ---
3 F.Supp.3d ----, 2025 WL 2637663, *3 (W.D. Wash. Sept. 12, 2025) (finding that
4 parolee's liberty interest did not expire with his parole agreement); *see also Y-Z-L-H- v.*
5 *Bostock*, --- F.Supp.3d ----, 2025 WL 1898025, *14 (D. Ore. July 9, 2025) (finding
6 detention of a parolee who had not completed his asylum process to be arbitrary and
7 capricious and ordering immediate release).

9 43. Because he received no procedural protections, the risk of erroneous deprivation is
10 high. When Respondents released Petitioner after his entry into the country in 2018, they
11 did so because they determined that he was not a flight risk or a danger to the community.
12 *See e.g., Fernandez Lopez*, 2025 WL 2959319 at *4 (quoting 8 U.S.C. § 1182(d)(5)(A)).
13 Prior to his re-detention in September of 2025, Petitioner had no notice of Respondents'
14 intention to re-detain him and no opportunity to contest that action. In the three months
15 that he has been in ICE custody, he has not received a bond or custody redetermination
16 hearing, and the regulations strip an immigration judge of any authority to release him on
17 bond, cutting off any avenue for review of his custody status in the existing immigration
18 court framework. Because the private interest in freedom from immigration detention is
19 substantial, due process requires the government to bear the burden of proving by clear
20 and convincing evidence that Petitioner is a flight risk or danger to the community before
21 re-detaining her. *See e.g., Fernandez Lopez*, 2025 WL 2959319 at *8; *J.S.H.M. v.*
22 *Wofford*, 2025 WL 2938808, *16 (E.D. Ca. Oct. 16, 2025) (unpub); *Abduraimov*, 2025
23 WL 2912307 at *9; *Mata Velasquez v. Kurzdorfer*, --- F.Supp.3d ----, 2025 WL 1953796,
24 *17 (W.D.N.Y. July 16, 2025) (detention of parolee without a reasoned explanation or
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1 changed circumstances and without a meaningful opportunity to be heard violates due
2 process).

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4 44. The government has no legitimate interest in detaining Petitioner without a hearing.

5 *See e.g., Fernandez Lopez*, 2025 WL 2959319 at *6; *J.S.H.M.*, 2025 WL 2938808 at *18;
6 *Noori*, 2025 WL 2800149 at *11 (“Respondents did not provide Petitioner individualized
7 notice and reasoning prior to his arrest and detention on June 12, 2025 and have presented
8 no legitimate reason for why those decisions were made. Any governmental interest of
9 efficient administration of immigration laws . . . does not outweigh these first two
10 factors.”). Bond hearings are a routine part of immigration court proceedings, imposing a
11 minimal cost to the government. *See Doe v. Becerra*, --- F.Supp.3d ----, 2025 WL
12 691664, *6 (E.D. Ca. March 3, 2025). Nothing in Petitioner’s record suggested that she
13 would abscond or endanger the community before a bond hearing could be carried out.
14 *See, e.g., Jorge M.F. v. Wilkinson*, 2021 WL 783561 *3 (N.D. Cal. Mar. 1, 2021); *Vargas*
15 *v. Jennings*, 2020 WL 5074312, *3 (N.D. Cal. Aug. 23, 2020) (finding that “the
16 government’s concern that delay in scheduling a hearing could exacerbate flight risk
17 or danger is unsubstantiated in light of petitioner’s strong family ties and his continued
18 employment during the pandemic as an essential agricultural worker”). In fact, Petitioner has
19 been represented by counsel throughout his proceedings and has a demonstrated record of
20 attendance at his immigration proceedings. He serves for the lead in his family unit,
21 including his wife and minor children. There is no reason to think that his compliance will
22 change if she is released pending a pre-deprivation custody hearing. To the contrary, he
23 has every interest in remaining a part of his family unit as he is the principal in the
24 removal case and seeks protection for his family.
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THIRD CAUSE OF ACTION

VIOLATION OF THE FOURTH AMENDMENT TO THE CONSTITUTION

(UNLAWFUL ARREST)

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45. Petitioner re-alleges and incorporates each allegation contained in paragraphs 1-32.
46. The Fourth Amendment protects the right of persons present in the United States to be free from unreasonable seizures by government officials.
47. As a corollary to that right, the Fourth Amendment prohibits government officials from conducting repeated arrests on the same probable cause.

It is axiomatic that seizures have purposes. When those purposes are spent, further seizure is unreasonable [T]he primary purpose of an arrest is to ensure the arrestee appears to answer charges Once the arrestee appears before the court, the purpose of the initial seizure has been accomplished. Further seizure requires a court order or new cause; the original probable cause determination is no justification.

Williams v. Dart, 967 F.3d 625, 634 (7th Cir. 2020) (cleaned up).

48. In the immigration context, this prohibition means that a person who immigration authorities released from initial custody cannot be rearrested “solely on the ground that he is subject to removal proceedings” and without some new, intervening cause. *Saravia v. Sessions*, 280 F. Supp. 3d 1168, 1196 (N.D. Cal. 2017), *aff’d sub nom.*, *Saravia for A.H. v. Sessions*, 905 F.3d 1137 (9th Cir. 2018). Courts have long recognized that permitting such rearrests could result in “harassment by continual rearrests.” *United States v. Holmes*, 452 F.2d 249, 261 (7th Cir. 1971).
49. On information and belief, DHS agents arrested Petitioner in 2018 after he and his family presented themselves at the border and paroled them as a family unit into United States, and released them on their own recognizance with a notice to appear in immigration court. Petitioner and his family have diligently appeared in

1 immigration court as instructed and complied with the minimal conditions of release that
2 DHS imposed. Due to exemplary compliance, the requirements for supervision have become
3 less and less over the course of the last seven years.
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- 5 50. DHS re-arrested Petitioner in September of 2025, based on nothing. There were no
6 changes in circumstances. Nothing unknown to Respondents. No lack of compliance or
7 desire to evade immigration laws. Upon information and belief, Petitioner had not
8 engaged in any conduct in the intervening time that made him a flight risk or danger to
9 the community. No material changes in circumstances justified Petitioner's re-arrest.
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11 51. Petitioner's re-arrest and detention by Respondents after he had already appeared in
12 court and absent any material change in circumstances is thus an unreasonable seizure in
13 violation of the Fourth Amendment.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Petitioner respectfully requests that this Court grant the following relief:

- 16 1. Assume jurisdiction over this matter;
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18 2. Issue a writ of habeas corpus ordering Respondents to immediately release Petitioner from
19 custody;
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21 3. Declare that Petitioner's arrest and detention violate the Due Process Clause of the Fifth
22 Amendment and the Fourth Amendment;
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24 4. Enjoin Respondents from re-detaining Petitioner unless his re-detention is ordered at a
25 custody hearing before a neutral arbiter in which the government bears the burden of
26 proving, by clear and convincing evidence, that Petitioner is a flight risk or danger to the
27 community;
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5. Award Petitioner his costs and reasonable attorneys' fees in this action as provided for by the Equal Access to Justice Act, 28 U.S.C. § 2412, and on any further basis justified under law;
6. Grant such further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED this 25th day of November, 2025

/s/ Emily L. Robinson
Law Office of Emily L. Robinson
5012 Eagle Rock Blvd Los Angeles, CA 90041
(O) (323) 524-7611
Emily@lawofficeemilyrobinson.com